**Radak 30(b)(6) 9/28/07 Deposition**

8:19    **Q.    Okay.  You understand you are**
**8:20  here to answer questions concerning a**
**8:21  production that Citigroup had made to the**
**8:22  plaintiffs?**
**8:23    A.   Yes.**
**8:24    Q.    And it was a production made on**
**8:25  July 7 -- July 16, 2007 and on August 17,**
**9:1            RADAK**
**9:2  2007?**
**9:3    A.   Yes.**
9:4    Q.    And what qualifications do you
9:5  have to answer those questions?
9:6        MR. MOORE:   Objection.
9:7    A.    I worked with related models for
9:8  a number of years, and I worked on -- on
9:9  this particular set of programs since June
9:10  of '96, and I was asked to look -- look at
9:11  a code and to produce the desired
9:12  sequences.
9:13    Q.   Since June you said of '96?
9:14    A.   June of -- pardon me.
9:15    Q.   2006?
9:16    A.   No.  No.  Pardon.  Since June of
9:17  2004, since I got the job at Citigroup.
9:18        MR. MOORE:   Thanks, Russell.
9:19        MR. MUNVES:   There is enough
9:20  detail in this case that we don't need to
9:21  have obvious misstatments on the record.
9:22        MR. MOORE:   Agreed.  I
9:23  appreciate it.
9:**24    Q.    So what did you do in connection**
**9:25  with the production?**
**10:1            RADAK**
**10:2    A.    Production of the sequences that**
**10:3  was given in July and August?**
**10:4    Q.  Yes.**
10:5    A.    Yeah.  I looked into the code
10:6  and recovered the code as if -- as it
10:7  existed at appropriate times in the past.
10:8  **First I looked through the log files and**
**10:9  tried to figure out when the relevant code**
**10:10  was changed.**  First I had to identify the
10:11  relevant code, and then I had to figure
10:12  out when it was changed and whether those
10:13  changes were of material nature or not,
10:14  and if I thought that changes were of

10:15  material nature, then I produced the
10:16  sequences for that particular date.
10:17  Q.   What was your criteria for
10:18  determining whether a change was of
10:19  material nature?
10:20    A.   Monte Carlo sequences are
10:21  produced using several functions, and
10:22  there are many -- many other files and
10:23  many other functions that were produced
10:24  over the last -- since 1994 since the
10:25  inception of RCS, and most of those
11:1          RADAK
11:2  changes did not have any relevance to
11:3  production of Monte Carlo sequences.
11:4    **Q.   Where did you find the log file?**
11:5    **A.   In RCS, mortgage analytics RCS.**
11:6    **Q.   Mortgage analytics RCS, that**
11:7  **is -- is that the same as the yield book**
11:8  **RCS?**
11:9    **A.   To my best knowledge, no.**
11:10   **Q.   What is the difference?**
11:11    **A.   I don't know exactly what the**
11:12  **difference is, but people who work for**
11:13  **yield book group are responsible for the**
11:14  **code that they present to the clients.  So**
11:15  **some of that code is directly taken from**
11:16  **us, but I don't know whether they produce**
11:17  **some edition that -- they have to produce**
11:18  **a front end that clients can -- can see,**
11:19  **and that part of the code is not produced**
11:20  **at mortgage analytics.**
11:21    **Q.   Well, is the -- is the code that**
11:22  **generates a sequence in the yield book RCS**
11:23  **code -- I am sorry -- the yield book RCS?**
11:24    **A.   Yes.**
11:25    **Q.   And did you check the yield book**
12:1          **RADAK**
12:2  **RCS for the code that they used to**
12:3  **generate sequences?**
12:4    **A.   I don't have access to yield**
12:5  **book RCS.**  I cannot --